

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BENJAMIN TAGG

Write the full name of each plaintiff.

CV

(Include case number if one has been assigned)

-against-

THE STRAUSS GROUP ISRAEL

MR MICHAEL AVNI

LYNTHON ANDREWS KOSTA LLP

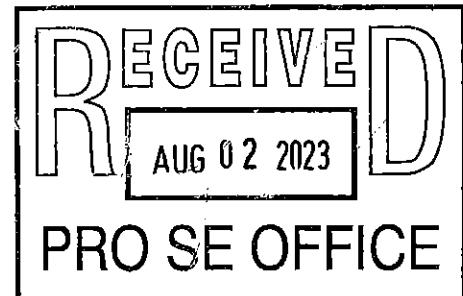
JOSEPH SALTARELLI - SILVIA OSTROVSKY

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

**COMPLAINT**

Do you want a jury trial?

Yes  No



**NOTICE**

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

*USING THE EXPRESSION OF A JUSTICE, THE DECISIONS, LACK OF  
ACCURACY AND DISREGARDING THE FACTS AND LAW LEAVES  
A HEAVY STENCH*

## I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- Federal Question**
- Diversity of Citizenship**

### A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

U.S TREATY WITH ISRAEL, AS PER THE CONSTITUTION THE SUPREME LAW OF THE LAND  
PERJURY - FRAUD - WIRE FRAUD, CONSPIRACY TO OBSTRUCT JUSTICE -  
OBSTRUCTION OF JUSTICE - CONSPIRACY TO OBSTRUCT THE OFFICIAL PROCEEDINGS -  
CONSPIRACY TO OBSTRUCT LEGAL RIGHTS.

### B. If you checked Diversity of Citizenship

#### 1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, \_\_\_\_\_, is a citizen of the State of  
(Plaintiff's name)

\_\_\_\_\_  
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of \_\_\_\_\_

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, \_\_\_\_\_, is a citizen of the State of  
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of \_\_\_\_\_

If the defendant is a corporation:

The defendant, THE SEASIDE GROUP, is incorporated under the laws of  
the State of ISRAEL  
and has its principal place of business in the State of ISRAEL  
or is incorporated under the laws of (foreign state) \_\_\_\_\_  
and has its principal place of business in ISRAEL.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

BEN

First Name

Middle Initial

TAAGER

Last Name

20 CHURCH STREET

Street Address

GREENWICH

County, City

CONNECTICUT

State

06830

Zip Code

917-767-2340

Telephone Number

BENJANITAAGER@GMAIL.COM

Email Address (if available)

## B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

THE STRAUSS GROUP  
 First Name LAST NAME  
MULTINATIONAL CORPORATION WITH LAWYERS AND SUBSIDIARY  
 Current Job Title (or other identifying information)  
52nd FLOOR - 14 NEW YORK STREET, 200 PARK AVENUE, NEW YORK CITY, NY 10166  
 Current Work Address (or other address where defendant may be served)  
NEW YORK NY 10166  
 County, City State Zip Code

Defendant 2:

JOE SARTORI SARTORI  
 First Name Last Name  
MANAGER OF HUNTON ANDREWS KURTZ LLP  
 Current Job Title (or other identifying information)  
200 PARK AVENUE 52nd FLOOR  
 Current Work Address (or other address where defendant may be served)  
NEW YORK NY 10166  
 County, City State Zip Code

Defendant 3:

MICHAEL AVNER  
 First Name Last Name  
EVP AND CHIEF LEGAL OFFICER  
 Current Job Title (or other identifying information)  
SABRA DRYING COMPANY 277 WESTCHESTER AVENUE FL 3  
 Current Work Address (or other address where defendant may be served)  
WHITE PLAINS NY 10604  
 County, City State Zip Code

Defendant 4: HUNTON ANDREWS KWEIJ  
First Name \_\_\_\_\_ Last Name \_\_\_\_\_  
Law Firm  
Current Job Title (or other identifying information)  
200 PARK AVE 52<sup>nd</sup> FLOOR  
Current Work Address (or other address where defendant may be served)  
NEW YORK NY 101 66  
County, City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

### III. STATEMENT OF CLAIM

Place(s) of occurrence: NEW YORK CDNY COURT AUG 02 - AUG 31

Date(s) of occurrence: AUG 02 - AUG 31 2018

#### FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

THE FIRMS, BOTH HAVE CORPORATE LIABILITY.  
HUNTONS LETTER OF AUG 02 INCLUDES PERJURY, CONSPIRACY TOGETHER  
WITH MR ANDREWS NEFIDAVIT OF AUG 31  
CONFIRM THE CONSPIRACY (SEE LIST OF VIOLATION)  
BY OBSTRUCTING JUSTICE AND OFFICIAL PROCEEDINGS I WAS DENIED  
OF MY RIGHT FOR COMPENSATION FOR FALSE DETENTION FOR 32 DAY  
PAIN AND SUFFERING, WITH THE EMOTIONAL TRAUMA DIRECTLY  
RELATED TO MY LONG COURSE, AND AFB. MY I REACH THE COURSE I WAS  
68 Y/O WHEN IT WAS DONE, OFFICIALLY AN ELDERLY & WILL BE 78 IN OCT  
16 2023. I SPENT 6 MONTHS IN HOSPITALS BETWEEN APRIL AND JULY  
2023.  
ALL THESE VIOLATIONS WERE INTENTIONAL AND MALICIOUS.

**INJURIES:**

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

SEE PAGE 5

**IV. RELIEF**

State briefly what money damages or other relief you want the court to order.

BASED ON PRECEDENT AND SCOTT'S RULINGS THE EXPOSURE OF THE

DEFENDANTS IS AS FOLLOWS:

1) HURRY PENALTIES - 20,000 DOLLARS PER HOUR

2) CONSIDERING THE PAIN & SUFFERING ON AN ELDERLY THE JURY WILL DECIDE

3) SCOTT'S RULING LIMIT PUNITIVE DAMAGES TO NINE TIMES THE COMPENSATORY DAMAGES.

4) BY THE JUDICIAL LAW THE LAWYERS (LAW FIRM) ARE LIABLE UP TO 3 TIMES  
THE COMPENSATORY DAMAGES.

## V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

AVG 02  
Dated

Plaintiff's Signature

Benjamin  
First Name

Middle Initial

TAOGER  
Last Name

20 CHURCH ST.  
Street Address

GOLDWICH  
County, City

CT  
State

06830  
Zip Code

917-767-7311  
Telephone Number

benjamin.taoeger@gmail.com  
Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

Yes  No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.